

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CHRISTOPHER GEORGE PABLE,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:19-cv-7868</b>
	)	
<b>v.</b>	)	<b>Judge Elaine E. Bucklo</b>
	)	
<b>CHICAGO TRANSIT AUTHORITY and CLEVER DEVICES LTD.,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
<b>CHICAGO TRANSIT AUTHORITY,</b>	)	
	)	
<b>Counter-Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>CHRISTOPHER GEORGE PABLE,</b>	)	
	)	
<b>Counter-Defendant.</b>	)	
	)	

**PABLE’S OPPOSITION TO CTA’S MOTION  
TO FILE A MOTION TO COMPEL IN EXCESS OF 15 PAGES**

Plaintiff/Counter-Defendant Christopher George Pable opposes Defendant/Counter-Plaintiff Chicago Transit Authority’s motion for leave to file a motion to compel in excess of 15 pages.

The CTA’s motion seeks two things. First, it seeks the cell phone Mr. Pable used at the time the events giving rise to this case took place. At the CTA’s request, Mr. Pable conducted a forensic examination of this cell phone. Mr. Pable provided the CTA with all the data collected from the phone as well as images showing the relevant communications retrieved in the form in

which they appeared on the screen of the phone. Neither satisfied with, nor trusting of, the work performed on Mr. Pable's behalf, the CTA seeks to reinspect the phone itself. The CTA justifies its request with a handful of reasons, each of which could easily be described in a page or two.

Second, the CTA seeks to compel Mr. Pable to produce copies of anything displayed on his personal website for the past two-and-a-half years (and thus for two years after the end of his employment with the CTA), notwithstanding Mr. Pable's objection that this information is irrelevant. The CTA addresses this issue in less than two full pages in its proposed motion.

There is no apparent reason that the CTA needs more than 15 pages to make its motion, nor does the CTA suggest any – other than to assert the extra pages (and 86 pages of exhibits!) are necessary “to fully address the procedural background and the deficiencies in Plaintiff's discovery.” There is no complex “procedural background,” and the alleged “deficiencies” are easily described.

Particularly in light of the CTA's request for costs, Mr. Pable therefore opposes the CTA's motion. Mr. Pable respectfully requests that, however the Court decides, he be allowed a like number of pages, and five business days from the date the motion is filed, for his response.

December 11, 2020

Respectfully submitted,

/s/ Timothy A. Duffy  
Timothy A. Duffy (ARDC #6224836)  
Law Office of Timothy A. Duffy, P.C.  
290 Shadowood Ln  
Northfield, IL 60093  
847-530-4920  
[tduffy@tduffylaw.com](mailto:tduffy@tduffylaw.com)

*Attorney for Plaintiff  
Christopher George Pable*